

# Federal Defenders OF NEW YORK, INC.

Leonard F. Joy  
Executive Director

## MEMO ENDORSED

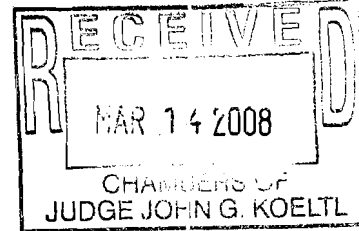
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March 14, 2008

### VIA FACSIMILE

Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007



Re: United States v. Eric Peels  
08 cr. 00036

Dear Judge Koeltl:

I write to request a 14-day extension of the pre-trial motions deadline, currently set for March 14, 2008. The Government consents to this request. The extension is necessary so that I may conduct additional fact investigation into matters directly affecting potential pre-trial motions.

Mr. Peels was indicted on January 10, 2008. Discovery was timely provided by counsel for the Government. On February 21, 2008, this Court set a schedule for the filing of pre-trial motions. Currently, trial is set for June 23, 2008.

I have undertaken diligent investigation of the events related to the charge against Mr. Peels. I, however, require additional time to continue my investigation as it relates to pre-trial motions. In addition, the requested extension will enable me to conduct further discussions with Mr. Peels about the contemplated pre-trial motions.

I have spoken to AUSA Amy Lester, who requests a modification of the briefing schedule previously set by this Court commensurate with the requested extension. Currently, the Government's deadline to respond to pre-trial motions is March 28, 2008. In addition, Ms. Lester has informed me that the police officers who arrested Mr. Peels are unavailable to testify at a suppression hearing on April 25, 2008.

Respectfully submitted,

Hugh Mundy  
Attorney for Eric Peels  
Tel.: (212) 417-8737

cc: Amy R. Lester, AUSA

*Time for motions extended to  
March 28, 2008.  
Time for response extended to  
April 11, 2008.  
Time to reply: April 18, 2008.*

*Conference remains set for April 25, 2008, although the Court  
will not conduct a suppression hearing on that date.  
3/18/08 So ordered.  
JGK*